

## **Exhibit H**

# 4

This letter is being submitted to clarify and correct statements that have been made on behalf of Susquehanna County by Attorney Reed in regard to the EEOC claims by Stoud and McNamara. Attached you will find letters addressing the three documents that we are aware of: Email from Attorney Reed to Jennifer Ulsh, Position paper for Susquehanna County to the EEOC in regard to Stoud, and Position paper for Susquehanna County in regard to McNamara.

The first issue, is that Attorney Reed has authored Position Papers on behalf of Susquehanna County without providing drafts to insure accuracy in the documents. I believe this is an issue of due diligence, we should have verified the documents to ensure that the statements provided are accurate. When I questioned this, the response I received was that Attorney Reed had copied our HR Director. Our HR Director has never received the letters, nor did Attorney Reed follow up with the HR Director to determine if the documents were received or in fact, if they were accurate.

In reviewing all the documents, it has become very clear that Attorney Reed has supported all of Commissioner Arnolds claims and remarks. Of course, this is understandable because Attorney Reed spent 4x longer with Commissioner Arnold. It is also my understanding that there were several phone calls between Commissioner Arnold and Attorney Reed. This is extremely disturbing to everyone else involved at the County. Some background, we cannot be positive, but we believe that Commissioner Arnold made the decision to run for office after her son applied for a position at the County and was not hired. It was reported and verified throughout her campaign that she said that "change in management had to happen", "they all have to go". You also need to understand that Commissioner Arnold has no formal education, no experience in management and no government experience. When she came on board we informed her that we have an 8:15 briefing meeting every morning with the Chief Clerk to receive updates and to set directions on necessary items. Commissioner Arnold in the last 18 months has made maybe 10 briefings. Her response was "I don't have to come in and it's too early for me, followed by I don't like the other Commissioner so I'm not coming in". When the County Solicitor, the Chief Clerk, and the Commissioners explained the importance of coming in her response was "I'll do what I want". Commissioner Arnold aligned herself with the less than hand full of employees, that have had personnel issues. These employees were treated equal to all, but decided not to follow the rules so they were disciplined. This included one employee that was an assessment officer and was reprimanded for peeking in people's windows and trying to push doors open to gain access to the house. Commissioner Arnold has always taking the position that we should not terminate people or write them up. Her comments have always been that everyone needs a job and another chance. There was an issue at the jail, we had just showed the training video supplied by CCAP on sexual harassment to the correction officers. An officer after watching the video placed his head into the breast of a female corrections officer. Commissioner Arnolds response was that we shouldn't fire him, maybe he didn't mean it and we should give him another chance. Of course, we have a ZERO tolerance policy. Over many months Commissioner Arnold has undermined the operations by going around Department heads and meeting with employees, some of which are Union employees. The County has an organizational chart and policies that support the chain of command. I have written several letters to Commissioner Arnold in regard to her undermining of the operations and violations of policies. I have had the County Solicitor and the Labor Attorney explain things to her, and both have given up. She said from the beginning that she didn't like the Chief Clerk or Deputy Chief Clerk, which was supported by her comments to the HR Director that she wanted them both fired. She refuses to talk to Stoud even though he still reports to the Commissioners. Her actions are unprofessional and have a negative effect

on the operations of the County. She will not accept that if two Commissioners (which is the majority) agree to do something then it's done. She believes that she should still be able to do what she wants. Commissioner Arnold took information on a personnel issue and went to the employee and had discussions with the employee creating additional issues. Most recently she entered the voter registration office after hours by herself and signed her name in the official tally books. Her response was that she took an oath to do things right so it was ok. She cannot accept, nor will she accept that she does anything wrong. Last October I tried to get her to step up by making her the chairman of the Commissioners. That did not work, she couldn't run a meeting, and actually only came into the courthouse 3 times in a month in a half. In December, I was put back in as the Chairman. Commissioner Arnold informs no one when she is coming or going and spends little time at the courthouse. She was given the Tick Task Force to head up for the County, this is the only thing that she knows well. However, other groups are in existence because they do not like what she does. When she does make it in and we have to make a tough decision, she usually stalls or passes to let someone else make the decision. All decisions are emotional or personal, and when she doesn't get her way she becomes confrontational and angry. She has spent a year and a half going to CCAP functions telling everyone how bad it is in our County and how mean everyone is to her. That is what she is best at, playing the victim, after all, she is in the local theater group. In addition, most employees feel nervous and uneasy when she is around.

In reading Attorney Reeds Position Papers, it appears we have taken something simple and turned it into a money machine. First in regard to McNamara, I believe a statute of limitations applies to her claim. Also, there has never been any complaints from her until she transferred, as well as her willingness to accept a different position. No one forced her to leave that position, and even Commissioner Warren said she would work with her to make it better. Pretty cut and dry. In regard to Stoud, there was never any loss in income, and only increases. Responsibility may have changed, but still at the level of income. Also, he has been asked on several occasions to come back as the Chief Clerk with an increase in pay, but has turned that down. Again, pretty simple.

Attorney Reed also to complicate things, got involved in the operations of the County by authorizing two Commissioners to review Stoud and McNamara's emails, after one Commissioner, the County Solicitor, and the County's Labor Attorney said NO! End result, another employee terminated, and a civil rights action filed against the County. If Attorney Reed stayed out of it, no one would have lost their job, and we wouldn't have another action against the County.

This summary is written with the support of Commissioners Hall and Warren and our County Solicitor, and I'm sure if I asked the Labor Attorney he also would agree. We are concerned over the representation as well as the possibility of Insurance Bad Faith.